

Southern HDs Landscape Restoration Project

Response to Comments

October 13, 2021

Addressed in this document are the comments received during the public 30-day comment period for the *Southern HDs Landscape Restoration Project* Pre-Decisional Draft Environmental Assessment (EA). The comment period was open from August 18, 2021 to September 17, 2021. Previous input received during the scoping period was addressed during the development of the Draft EA and is summarized in the Draft EA and Scoping Summary and detailed in the project record.

During the 30-day public comment period, comments were received from 19 external sources: eight from individuals, four from Tribes or Pueblos, one from another federal agency, one from the state wildlife agency, one from a county, and four from user groups and other non-governmental organizations. A summary of all the comments with the Forest Service responses follows in the table. Full text of the comments can be found in the project record or on-line at <https://cara.ecosystem-management.org/Public/ReadingRoom?Project=58742>. All project record documents are available upon request.

Comment #	Affiliation	Comment: quote, paraphrase, or topic	Forest Service Response
1.1	Southern Ute Indian Tribe	The area has cultural significance. Consult and integrate both NEPA and NHPA early to support discussion and consideration of historic properties that have cultural and religious significance with other environmental factors.	Consultation with the SUIT was initiated in September of 2020 with a follow up field trip to proposed project area in May of 2021 to discuss tribal concerns. Consultation will continue throughout stages of implementation.
1.2	Southern Ute Indian Tribe	Strong opposition to the expansion of motorized or nonmotorized recreation in the Southern HDs. Any temporary roads or trails should be fully reclaimed as quickly as practicable, with follow-up monitoring and management to prevent weed invasion.	This project no longer proposes any change to recreation management. Reclamation of temp roads is included in the proposed action.
1.3	Southern Ute Indian Tribe	How will the potential impact to surface water quality be mitigated? Do you have a plan in place to mitigate surface water quality impacts from flooding as a result of surface disturbances such as timber harvesting, construction, and controlled burns?	Construction and mechanical treatments will need to comply with the identified buffer distances to perennial, intermittent, and ephemeral drainages located in this landscape. Specific soils and watershed design criteria identified in Appendix A of the EA along with standard best management practices will be applied to protect against long-term sedimentation, flooding, and erosion from the proposed actions.

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1.4	Southern Ute Indian Tribe	Mitigate air quality impacts from controlled burn smoke concurrent with regional wildfire smoke. Avoid burning during times of temperature inversions, preventing particulate matter impacts in valleys and topographical lows.	All prescribed fire is done under permit conditions from the Colorado Department of Public Health & Environment. These conditions are designed to limit smoke impacts to the public.
2.1	Individual (Blackburn)	Lack of information in the EA about potential cultural resource destruction and/or identification of Modified Trees of especially Ute origin. SUIT should be consulted, especially regarding survey and protection of old growth ponderosa.	Consultation with the 25 tribes that are culturally affiliated and traditionally associated with SJNF, including the SUIT, was initiated in September of 2020 with a follow up field trip to proposed project area in May of 2021. Consultation will continue throughout stages of implementation. Appendix D of the <i>Programmatic Agreement among the United States Forest Service, Rocky Mountain Regional Office, Pike-San Isabel National Forest and Cimarron and Comanche National Grasslands, Routt National Forest, San Juan National Forest and the Colorado State Historic Preservation Officer Regarding Vegetation Management Undertakings (USDA 2017)</i> : Site Protection Measures identifies a strategy and activity-specific design features intended to mitigate potential adverse impacts of the proposed activities on cultural resources. With adherence to all cultural resource design elements, the proposed action will have no adverse effect on cultural resources, including Culturally Modified Trees. Wording in the EA has been added to clarify.
3.1	San Ildefonso Pueblo	Defer comments to Southern Ute Indian Tribe	Thank you for your response.
4.1	San Juan Citizen's Alliance	We question the use of the term "catastrophic" for the description of a type of wildfire in a NEPA document such as this EA as it has no scientific definition or standing.	Wording of "catastrophic" has been replaced with "high intensity" in the final EA.
4.2	San Juan Citizen's Alliance	Lack of information regarding old growth and how their "well being" will be managed during the project, particularly prescribed fire.	See stand-alone Old Growth Report document. A summary of this document and an old growth map were added to the EA. Mechanical treatment units which overlapped with mapped old growth were removed from the proposed action in the final EA. Additionally, two project-specific design elements were added to the EA regarding allowed activities in old growth: "No mechanical thinning or mastication will be used within old growth stands or in Colorado Roadless Areas" and, "Hand thinning will be used where needed to prepare old growth stands for prescribed fire."
4.3	San Juan Citizen's Alliance	Any change in the road and trail system with the HD's should be addressed through a travel management focused NEPA process.	No change in the road and trail system is proposed.

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4.4	San Juan Citizen's Alliance	Recommend that the project area map include the HD Roadless Area. Both the public's and agency staff's aware of Roadless Area realities could be heightened.	A map of CRA was added to the final EA. CRA was considered as the proposed action was being crafted, as evidenced by the fact that acreage which was initially considered for mechanical treatment was removed from the proposed action when it was discovered that it overlapped with CRA.
4.5	San Juan Citizen's Alliance	Nothing within the EA that specifies a cultural resource area inventory will be undertaken specifically before a control fire line is constructed. Cultural trees should be clearly delineated/marked as "save" trees.	The procedure set forth in the <i>Programmatic Agreement among the United States Forest Service, Rocky Mountain Regional Office, Pike-San Isabel National Forest and Cimarron and Comanche National Grasslands, Routt National Forest, San Juan National Forest and the Colorado State Historic Preservation Officer Regarding Vegetation Management Undertakings (USDA 2017)</i> would be followed to satisfy compliance with Section 106 of NHPA. Under the PA, phased cultural inventories will occur prior to project implementation, this includes fire lines. Any potential adverse impacts to historic properties (includes culturally modified trees) will be mitigated through measures outlined in Appendix D: Site Protection Measures of the Programmatic Agreement. Wording in the EA has been added to clarify.
4.6	San Juan Citizen's Alliance	Verify that "There are no known traditional cultural properties or sacred sites in the landscape." p.51	Text in EA Roadless section was modified in response to some tribal feedback.
4.7	San Juan Citizen's Alliance	What kind of plant survey was done and how current is it? Recommend the survey be updated with a particular focus to plants that could very well occur in the project area, but have not been documented ...including vetches and cacti.	A number of surveys and other data sources were consulted for the best available scientific information regarding the distribution of rare plants in the project area. Sources included data from the Southwest Environmental Information Network, the Colorado Natural Heritage Program, the U.S. Fish and Wildlife Information Planning and Conservation Website, and internal U.S. Forest Service Data. Because no additional surveys were specifically conducted in preparation for the proposed action, we used known habitat characteristics and models to evaluate potential impacts while assuming that habitats may be occupied. Surveys were conducted for <i>Pediocactus knowltonii</i> (Knowlton's cactus) by the U.S. Forest Service (May 9 and 17, 1995) within the project boundaries; however, it was determined that these areas did not contain suitable habitat based on the lack of piñon-juniper-sagebrush communities and the lack of cobbly riverine alluvial soils (Dickerson 1995). We also considered potential impacts to three milkvetch species: <i>Astragalus iodopetalus</i> , <i>Astragalus missouriensis</i> var. <i>humistratus</i> , <i>Astragalus proximus</i> (please see additional details in the EA and the Biological Evaluation for Threatened, Endangered, Proposed and Sensitive Plants). The San Juan National Forest is committed to using the best available scientific information and will continue to collaborate with our partners to maintain available data on rare plants and their habitats.

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4.8	San Juan Citizen's Alliance	Recommend that existing design element 24 explicitly note that the prohibition on masticating or cutting riparian and wetland species apply to both trees and shrubs.	There will be no manipulation of vegetation within riparian vegetation, streamside management zones, and wetlands. Any proposed treatments would utilize buffers recommended by District Hydrologist. Those recommendations are derived from Best Management Practices as well as the Watershed Conservation Handbook. Additionally, wording in existing design element #10 was edited, which also addresses this issue.
4.9	San Juan Citizen's Alliance	Weed inventory is not dated. Please update the Final EA with this information. It would be helpful if the Final EA could provide specific operational information about the weed program such as the anticipated timing and number of visits to the project area for weed treatment for "x" number of years following the project implementation.	Weed inventories analyzed were collected within the past decade with some inventories as recent as last year. Weed treatments will generally occur in early summer. The number of visits to project areas will be dependent on-site conditions with areas exhibiting greater levels of infestation treated for a longer period of time.
4.10.	San Juan Citizen's Alliance	Design element #17 says 40% slope. BE says 35% slope. We recommend a lower metric such as 25% be utilized.	The Biological Evaluation was edited to be consistent with the final design features for slopes and mechanical treatments found in the EA (limit equipment operations to sustained slopes less than 40%).
4.11	San Juan Citizen's Alliance	Design element #17 says 15% disturbance. While we can support the 15% acceptable level of disturbance areas where the project focus is the removal of a significant amount of younger and small trees that will not be hand thinned or masticated, the percentage for other treatments areas should be decidedly less.	A maximum of 15% disturbance is identified as an acceptable limit to prevent long-term impacts to soil and water resources within this landscape, but less is expected. Design criteria and other applied best management practices will minimize impacts from the proposed actions and monitoring will be needed throughout the implementation phase to verify if disturbance limits are being met and if they are adequate in this landscape.
4.12	San Juan Citizen's Alliance	Firmly opposed to any road building, including "temporary" roads.	Thank you for your opinion. The proposal is limited to one mile of temp road.
4.13	San Juan Citizen's Alliance	Insufficient design criteria for WL survey immediately prior to project work. Reference Management Recommendations for the Northern Goshawk in the Southwestern United States. No specificity as to the metrics for identifying SWWF habitat and how this information will be recorded and integrated into project design maps. Western yellow-billed cuckoo not included.	Current policy directs the forest to conduct site occupancy, pre-implementation surveys for sensitive and federally-listed species when determined necessary by an agency biologist (Final San Juan National Forest, March 2021, Land and Resource Management Plan, 2.3 Terrestrial Wildlife, Guideline 2.3.50). For this project, biologists determined that pre-implementation surveys were not necessary in order to meet our obligations to maintain viable populations of sensitive species and contribute to the recovery of federally-listed species within our jurisdiction. While we acknowledge that some adverse effects may occur to sensitive species, we anticipate such effects will be short-term and localized in nature. Ultimately, the objective of this project is to restore departed ecosystems in ways that are likely to benefit native species. While we have not adopted the full suite of

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			<p>recommendations from <i>Management Recommendations for the Northern Goshawk in the Southwestern United States</i> (Reynolds et al. 1992), we feel that the proposed action serves to meet many of the desired conditions outlined in those recommendations. In particular, we find that this project serves to address major habitat concerns by lowering risks of stand-replacing, high-severity fire and by increasing structural diversity and composition. Habitat for the southwestern willow flycatcher was identified using internal habitat models based on riparian vegetation. Some habitat does occur along the Piedra River; however these areas are not included in the proposed actions. Furthermore, the current proposal includes direction to mark and buffer stream courses, wetlands, spring, and water influence zones. Mechanical equipment is generally prohibited in these zones (see Appendix A - Existing Design Elements and Best Management Practices, Watershed).</p> <p>The BE addresses the western yellow-billed cuckoo and determined that "There are no low-elevation gallery cottonwood forests with dense understory in the proposed treatment area. Within the proposed project area there are some cottonwood trees along Squaw and Saul's Creeks, but its limited extent precludes these small riparian areas from being habitat for cuckoos."</p>
4.14	San Juan Citizen's Alliance	San Juan Citizen's Alliance opposes any treatments during the wintering period, activity should be avoided. If they do, treatments should be clustered as closely together as possible to minimize the area impacted.	Project activities in the proposed action are required to comply with San Juan National Forest Land and Resource Management Plan. Accordingly, project implementation should abide by the Forest Plan guideline 2.3.60 to limit or avoid management activities and access in critical winter range, severe winter range, and winter concentration areas for pronghorn, elk, and mule deer from December 1–April 30. However, because this guideline leaves room for some discretion, we have incorporated additional design elements #1 and 2 in case some activities are authorized inside of this winter closure period. These elements restrict the temporal and spatial amount of activity that could occur.
4.15	San Juan Citizen's Alliance	For numerous reasons we believe that control fire lines should be rehabilitated after their use despite their "re-use" being a likelihood after a few years. Conflicting information as to the comprehensiveness of the application of the design element 34.	Existing Design Element #34 was moved up into Project-Specific Design Elements (new #7), and language was added regarding installation of erosion control measures on steep erosive soils. Language will also be included in prescribed fire burn plans requiring rehabilitation in areas that are highly prone to erosion.
4.16	San Juan Citizen's Alliance	Any use of (goat) grazing needs to be carefully managed and monitored and we are concerned that the SJNF will not have the resources to conduct adequate ongoing monitoring.	Should goats be used for vegetation management as analyzed, we anticipate their use would be highly localized and actively managed by the contracted herders or with temporary electric fencing. Contractors would follow an agreed-upon operating plan with post-project monitoring by Forest Service staff.

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4.17	San Juan Citizen's Alliance	No mention of the existing SJNF old growth inventory. Forest Plan 2.2.74. Entirely deficient of design elements for OG. Identify zones where specific measures may be indicated to support old growth retention and recruitment. Recommend that the project design include a methodology for locating old growth stands and detail tactics to support old growth trees/stands before prescribed burning is undertaken.	See Response 4.2
4.18	San Juan Citizen's Alliance	Design element #20 is not adequate to foster the recruitment of old growth because it refers to only trees older than 140 years. Trees greater than 16" DBH and 100+ years old should also be protected as old growth recruitment.	See Response 4.2
4.19	San Juan Citizen's Alliance	Design element #10 - strongly recommend that <i>none</i> of the vegetation within 25 feet of defined drainages should be masticated or cut.	Existing Design Element #10 was re-worded in the Final EA to accept the suggested edit.
4.20.	San Juan Citizen's Alliance	Design element #16 - 100 feet is much too close ... related to weed seed and erosive soil transport, as well as other factors. We would recommend doubling the setback to 200'.	Currently there are no plans for landings (in a historical sense) to be developed in this landscape. The proposed actions identify mechanical treatments to entail hand-thinning and commercial firewood provision. In addition, "ephemeral streams" was added to existing design element #16.
4.21	San Juan Citizen's Alliance	Project areas would be best addressed through hand thinning rather than mastication because of soil types, steep slopes, and impacts under old growth.	Mastication, and other work requiring heavy equipment, is limited to soil types, soil moisture conditions, and slopes where any impacts will be minimal. Two design elements were added to the final EA addressing activities in old growth.
4.22	San Juan Citizen's Alliance	Sourcing of the 15 – 29" annual precipitation figure? This range seems to be higher than the recent norm, or what we're likely to experience in the coming decades. Bayfield "water year" precipitation total which will finalize in two weeks is barely over 10".	Precipitation in this landscape is topographically driven and results in a large range of precipitation values since elevations vary greatly. Modeled state of Colorado data from the timeframe of 1971-2000 was used and will inherently contain error because site-specific precipitation gauge data was not available. Changes to the precipitation regime are expected from climate change moving forward, but the proposed actions in this EA attempt to account for this.
4.23	San Juan Citizen's Alliance	Need to manage for a "FRV" (future range of variability) rather than the quickly becoming-irrelevant HRV. See attachment A of the DWRF collaborative's Desired Conditions. Challenge Columbine RD to modify the Design elements to address the FRV.	The future range of variability is a consideration made by the District Silviculturist and Fuels Specialist on a stand-by-stand and project-by- project basis. The work completed by Dr. James Worrall has been used for prescription development on the Columbine and Pagosa Ranger Districts and inferences made by Worrall et al. will continue to be utilized for making silvicultural decisions in the southern HD's.

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5.1	individual (Compton)	Lack of weed control. Admitted past failure in weed control. There is no way to reclaim the wells pads and soil disturbance. Any additional disturbances through this EA action will only make an unmanageable weed control problem even worse. This alone should be enough to not do the project.	Noxious weed populations in the HDs are admittedly located in visible locations along roads and trails, but are limited in their overall extent and remain at manageable levels. Project areas will be inventoried and pretreated for noxious weeds as necessary. Post treatments of noxious weeds will occur as necessary. The management of other projects (gas field development) is beyond the scope of this analysis.
5.2	individual	Soil disturbing activities – <u>all</u> must be documented, acreage counted, and rehabilitated. Skid trails, landings, overland access routes, stream crossings, slash piles, all equipment, etc. Include impacts of all new, proposed well sites on this landscape and the environmental consequences.	The soil disturbing activities called out here have not been identified on the ground yet, but will be accounted for in upcoming design documents and contracts in order to meet the design criteria in this document. Best management practices will be applied to minimize impacts of soil disturbing activities to prevent long-term damage to soil resources and field monitoring will need to occur during implementation to see if thresholds are being met. Impacts of natural gas development is considered as part of the existing condition in the EA.
5.3	individual	Cultural resources. A complete, thorough, and honest field inventory must be done before any treatment is done. Needs to be done BEFORE any disturbance.	The procedure set forth in the <i>Programmatic Agreement among the United States Forest Service, Rocky Mountain Regional Office, Pike-San Isabel National Forest and Cimarron and Comanche National Grasslands, Routt National Forest, San Juan National Forest and the Colorado State Historic Preservation Officer Regarding Vegetation Management Undertakings (USDA 2017)</i> would be followed to satisfy compliance with Section 106 of NHPA. Under the PA, cultural inventories will occur prior to project implementation. Wording in the EA has been added to clarify.
5.4	individual	Post treatment soils moving down Bull Creek into the Piedra River will impact water quality.	Short-term impacts to soil stability are expected from some of the actions proposed. The implementation of design criteria and other best management practices are expected to minimize impacts to water quality and prevent long-term degradation to local soil and water resources.
5.5	individual	Adding total acreage in Bull Creek from Northern and Southern Landscape Restoration EA's is a grand total of 71%. Combining the Southern and Northern HD's landscape restoration plan affected watersheds, 41,185 acres are proposed to be altered. These two EA need to be combined into one EIS and all of the impacts needs to be addressed at the same time using the most current climate science.	Both EAs have reached a Finding of No Significant Impact. Cumulative impacts from both EAs <i>were</i> considered as part of the analysis for this EA, and no significant cumulative impacts were identified, as stated in the Watershed Conditions section of the EA, "...the silvicultural treatments proposed in this EA, in combination with the prescribed fire and silvicultural treatments described in the Fosset Gulch/Northern HDs Ecosystem Restoration EA (USDA 2016) and Vallecito-Piedra Integrated Vegetation Management Plan EA (USDA 2018a), would help restore healthy stand density, structure and diversity, increasing resiliency and resistance to changing environmental conditions that could otherwise adversely affect water resources. The long-term adverse cumulative impacts from the proposed actions described in this EA would be minimal to water and soil resources, whereas beneficial effects would ultimately help increase

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			watershed health and resiliency." Implementation at both spatial and temporal scales will drive cumulative impacts in watersheds that currently have a high percentage of land with proposed activities. Activities will be planned in a manner where there is enough time and space to provide for adequate recovery of vegetation and soil resources to prevent negative impacts to overall watershed health and at a watershed scale.
5.6	individual	Need to include the entire Bull Creek watershed. Cannot subjectively manage half a watershed. The headwaters of Bull Creek need to be managed for fire. The Northern HDs EA science is too old.	All parts of the watershed <i>are</i> being managed, including the headwaters of Bull Creek; they are just analyzed in two different EAs. Until recently, most projects proposed on the San Juan National Forest did not encompass entire watersheds or large parts of them because of agency direction, complexity, cost, and personnel available for implementation. Multiple EAs were needed to identify and complete project work in the HD Mountains landscape in the past. Cumulative effects discussions and analyses will be performed when undertaking work to the scales proposed and this has been incorporated in this analysis. Also see Response 5.5
5.7	individual	Most stream systems currently fall into the at-risk or diminished classes. Prescribed fire and mechanical treatment will only harm the creek and this watershed, not improve it.	Overall watershed health is a function of many different parameters. The proposed actions identified in this EA will help meet a number of SJNF Forest Plan objectives and desired conditions. Preventing large-scale, high-severity burning in this landscape from wildfire is paramount to the short-term and localized impacts to soil and water resources from the proposed actions. Implementation actions will still need to comply with design criteria meant to protect resources within these watersheds and these actions will ultimately result in more robust and resilient watersheds within this landscape.
5.8	individual	Extinction of plants and animals. Extinction happens one plant or animal at a time. Botanists and wildlife biologists and other field scientists must be on the ground when all of these planned disturbances are happening, finding and inventorying all species that might be lost and protecting those that need it.	The San Juan National Forest is committed to contributing to the recovery of federally-listed threatened and endangered species, ensuring that sensitive species do not become threatened or endangered because of Forest Service actions, and maintaining viable populations of all native and desired nonnative wildlife, fish, and plant species. While not all projects involve pre-implementation surveys, our wildlife, botany, and fisheries programs conduct ongoing surveys and data collection efforts in collaboration with our partners and stakeholders (e.g., Colorado Parks and Wildlife, Colorado Natural Heritage Program, U.S. Fish and Wildlife Service). We used data from these and other sources while evaluating potential effects to species. In cases where survey data was not available, we used known habitat associations and assumed they may be occupied.
5.9	individual	Lack of wildlife and plant field inventories. There is no way to know if you are or not impacting individuals or entire species if you do not do real field inventories/counts to know what's out there.	See Response 5.8.

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5.10.	individual	Climate Science - No acknowledgement, modification, adjustment or any sense of concern or the need to do things differently in this EA. Suggest closing roads and trails to protect from climate change. Responses of vegetation to variations in climate are expected to be most rapid and extreme at ecotones, the boundaries between ecosystems. The HD's are this boundary. The long term drought forecast for the HDs is "exceptional drought" and any cutting of ponderosa pines may not regenerate.	Climate adapted silvicultural approaches will be deployed across the different proposed activities in this landscape. Current ponderosa pine densities and the increase in shrub species has made stands in the southern HD's even more susceptible to climate driven disturbances. The deficit of young ponderosa pine regeneration in the landscape has a direct correlation to lack of growing space and overcrowding of Gambel oak. Selective thinning of advanced intermediate and co-dominant ponderosa pine will allow pine stands in the southern HD's to be more resilient to high intensity fire and insect/disease. Proposed activities should also decrease the risk of crown fire in ponderosa pine stands. Principles from the Advanced Silviculture for Climate Change (ASCC) site on the Pagosa District will continue to be used in dry pine silvicultural prescriptions on the Columbine District. Climate change resistance, resilience, and transition approaches will be chosen based on the aspect of stands and the current species dominance and presence of shrub species.
5.11	individual	T&E species habitat exists for Knowlton's cactus, southwestern willow flycatcher, Mexican spotted owl, and yellow-billed cuckoo. These species should be surveyed for.	We conducted site visits in the action area to evaluate potential habitat for and occurrences of Knowlton's cactus, southwestern willow flycatcher, Mexican spotted owl, yellow-billed cuckoo, and other species. While we evaluate species and their designated critical habitats based on their geographic range (generally provided by the U.S. Fish and Wildlife's Information for Planning and Consultation website or an official list from a field office), we determine the potential effects based on the best scientifically available data on known species distribution and habitats on the forest. This data comes from varying sources which include past surveys, habitat models, and site evaluations. In this case, our specialist determined that suitable habitat was not present in the action area for the aforementioned species. Please see the Biological Evaluation for Terrestrial Wildlife in the Southern HDs Landscape Restoration Project for additional details.
5.12	individual	Potential northern goshawk nests must be documented and protected and no adverse management activities should occur at any time in suitable nest areas.	The proposed action includes management practices that direct the forest to document any raptor nests discovered during layout or implementation and requires the district biologist be consulted for mitigation actions. Specifically, timber crews are to be trained to identify goshawks and their nests (see Appendix A - Existing Design Elements #5 & 6).
5.13	individual	pockets of cottonwood/willow wet areas in Bull Creek's creek bed are micro wetlands. These rare areas in Bull Creek and in openings in this watershed must be protected.	The proposed action includes direction to mark and buffer stream courses, wetlands, spring, and water influence zones. Mechanical equipment is generally prohibited in these zones (see Appendix A - Existing Design Elements #10 and 24).

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5.14	individual	Pinyon pine trees in Bull Creek - Because of their low number they need to be protected. They provide important bio-diversity in this drainage.	While piñon trees serve as important habitats for a number of species, our assessment describes a number of benefits from the prescribed treatments to piñon-juniper systems. These woodlands exist naturally in dynamic systems with periodic disturbances, such as from wildfire. The prescribed treatments are designed to replicate natural disturbances and seek to avoid high severity fires which tend to replace stands and have greater effects to local diversity.
5.15	individual	Old growth stands of ponderosa and juniper. The old growth mapped stand of Ponderosa Pine trees just after the confluence of Little Bull and Bull Creek needs to be saved and the Gambel oak underneath needs to be removed by hand thinning. Trees old enough to become old growth in the future must also be protected.	There are no mechanized activities proposed for the areas adjacent to the identified ponderosa pine old growth stands; see figures 2 and 4 in the EA showing proposed mechanical treatment areas. A design element was added to the final EA that states, "Hand thinning will be used where needed to prepare old growth stands for prescribed fire."
5.16	individual	Roundheaded pine bark beetle complex in lower Bull Creek. Will the efforts of this proposed action make the infestation worse?	There are known endemic levels of western pine beetle, mountain pine beetle, and roundheaded pine beetle within the analysis area, although populations of bark beetles are increasing due to long-term climate driven drought conditions. Our proposed actions will introduce stand and tree level vigor which will increase the ponderosa pines resiliency to bark beetle attacks and will promote better conditions for pine regeneration over the next couple decades.
5.17	individual	Arboles Milkvetch. The Colorado Natural Heritage Program describes this native as a "plant of concern" with no protection. The Forest Service needs to protect it. Also, the San Juan Rare Plant Climate Change Vulnerability Assessment by the Colorado Natural Heritage Program indicates that there are 2 rare plant species near Bull Creek.	At this time, the Regional Forester has not designated <i>Astragalus oocalycis</i> (Arboles milkvetch) as a Regional Forester sensitive species. As such, we have not conducted a biological evaluations specifically for this species in preparation for this project. Additionally, we do not find the species on the most recent list of the Colorado Rare Plant Guide master list. The best available information we have suggests that the species was moved to the state watchlist after surveys observed relatively robust populations in the region (<i>Rare Plant Survey San Juan National Forest</i> , Lyon and Denslow 2002). We have evaluated other potential effects to three <i>Astragalus</i> species and other plants that occur in or near the project area, including Bull Creek.
5.18	individual	RMRI mapped two areas near bull Creek for projects that should be factored into this EA.	The two dots shown on the referenced map represent projects already accomplished under the Fosset Gulch/Northern HDs Ecosystem Restoration EA (2016), so they were considered in this EA as part of the existing condition.
5.19	individual	Provides lists of bird and plant species identified by volunteers.	Thank you for this information.

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5.20.	individual	Goat herders must stay with the goats overnight so predators do not kill them. We do not want to teach the predators about goats and killing them. Location of goat herds with dogs must be made public BEFORE they are in place so those of us hiking with our dogs can avoid the area.	Should goats be used for vegetation management as analyzed, we anticipate their use will be highly localized and actively managed by the contracted herders or with temporary electric fencing. Such management should reduce risks to goats and minimize impacts to forest users. Use and location of contracted goats would be publicized prior to deployment for user awareness and safety.
5.21	individual	The Chimney Rock view shed must be addressed in this EA and how this proposed action may be out of the viewshed compliance.	The project area falls within the middle ground and background viewshed of Chimney Rock. Portions of the eastern most treatment area (near Goose Creek) are within the middle and background viewshed. This project conforms with 2.15.2 of the Forest Plan, in that the landscape restoration project will perpetuate the vistas of the southern HDs as seen from Chimney Rock by reducing the risks of catastrophic wildfire, which could significantly alter the viewshed. It also conforms with several elements of 2.15.25 including <i>a, b, d, and e</i> .
5.22	individual	Provide a map where public firewood collection and small commercial firewood will happen. Where, when, and how many acres are planned for timber harvest of ponderosa pine. Will roads be created? How many years is "phases over several years"?	Figure 2 in the EA shows the potential mechanical treatment areas. Particular methods to be used in each mechanical unit (such as firewood-vs-commercial) will not be decided until implementation, and will be based on market and industry conditions at the time. There are no conventional timber sales planned for the southern HD's landscape. Stewardship and service contracts will be the likely tool utilized to complete restoration and vegetation management. The "phases over several years" can be interpreted as anywhere from 3-10 years for project work to be completed based on the style of contract utilized.
6.1	individual (Furnish)	Old growth concerns: Forest plan specifies only Rx burnings, no mechanical work. OG remnants have survived historic fires in the HDs on numerous occasions. Why would you conclude they won't again?	See Response 4.2
6.2	individual	Treatment of oak brush - carefully weigh the cost needed for several thousand acres vs. the anticipated benefit.	Specific areas of oak mastication or thinning will be carefully selected to complement other treatments such as prescribed fire.
6.3	individual	The condition of the HDs is largely the result of many decades of natural processes. I doubt they will change much in the next few decades, nor do they seem to pose much of a threat as they are.	Natural processes in the southern HD Mountains would mean that the landscape had a regular fire return interval with low to mixed severity fire occurring approximately every 8-22 years. This is very much not the case today; we have missed numerous fire return intervals in the southern HD's and therefore we are left with an unnatural pattern/density of vegetation across much of the analysis area. Ponderosa pine dominated areas within the analysis area are threatened currently by the expansion and sprouting of Gambel oak and the encroachment of young piñon-juniper.

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7.1	individual (Honea)	Physically remove as many wood products as possible from the restoration areas. Investigate and consider alternatives to minimize prescribed burns. Balance the option of physical extraction versus the risk and impact of burns. Leave slash as mulch for moisture retention. Burn piles instead of broadcast burning - more controllable and less smoke. Allow public removal of thinning materials.	Successful suppression of naturally ignited wildfires over the last 100 years has created an unnaturally high fuel loading, and the best way to reduce this is with broadcast prescribed fire. Pile burning can only be used for small acreages, and any sort of removal may require the use of heavy machinery, which is problematic in the HDs for several reasons.
7.2	individual	To the best of our knowledge, there was never a proposal to connect the Spring Creek Road with Saul's Creek via an OHV trail. Perhaps this is a typographical error. We were very pleased to read on page 14 of the draft EA that the proposed motorized OHV trail connecting Ute Creek Trail and Saul's Creek was dismissed from consideration.	The motorized trail is no longer part of the proposed action. It would have connected the Saul's Creek motorized trail system to the Spring Creek motorized trail system at the Ute Creek Trail, as the author noted.
7.3	individual	Clarify whether any future consideration of the OHV trail would require a new EA process	Yes, future consideration of a new trail would require a new NEPA process, including the needed data collection, trail layout and design, and public notice and comment periods.
7.4	individual	Stage smoke density monitors at appropriate locations to make meaningful evaluations of smoke density and actual impact on residents. Understand that the impact of smoke from prescribed burns is on an individual basis, particularly for residents with respiratory issues. Don't sacrifice the adjacent residents' health for the benefit of the larger community.	All prescribed fire is done under permit conditions from the Colorado Department of Public Health & Environment CO DPHE). These conditions are designed to limit smoke impacts to the public. We use smoke monitors when CO DPHE requires or recommends them.
8.1	La Plata County	This project is essential to protecting the Southern HDs by reducing wildfire risks. La Plata County supports the continued commitment for landscape restoration work. Protecting natural resources from wildfire is a priority within La Plata County.	Thank you for your support.
8.2	La Plata County	Continued coordination is appreciated, as it will facilitate early and frequent public notice of operational activities associated with the project.	Notification of affected individuals, entities, and the public is included in design element #36, which has been slightly re-worded to more inclusive.

Comment #	Affiliation	Comment: quote, paraphrase, or topic	Forest Service Response
9.1	individual (Johnson)	The old growth GIS data and maps should be included in the Pre-decisional EA. Forest Plan states the only treatment allowed in old growth is prescribed fire.	See Response 4.2
10.1	forest product permittee	Concerned regarding the "treatment of noxious weeds", and chemical use affecting forest products that are harvested for food ingredients.	Herbicide treatments of noxious weeds will be made by spot applications to reduce the potential for drift onto non-target vegetation. Broadcast applications of herbicides will not occur. The discrete application of herbicides poses very little risk of contaminating forest products.
11.1	Great Old Broads for Wilderness for Wilderness	Old growth concerns. Need for site-specific analysis. Lack of specific and detailed attention to old growth ecosystems within the HD Mountains. Forest Plan authorizes only prescribed fire in old growth vegetation areas, and only after proper field review and documentation of analysis. FP 3.25.20 The old growth inventory should be evaluated and utilized for a project of this size and importance, and all GIS data and maps should be included in the analysis and available for the public to consider as part of the project record. FP 2.2.74 Looking only at old ponderosa pine established prior to 1880 is not a scientifically-valid characterization of "old growth", and certainly not of old growth forest ecosystems. There are substantial numbers of trees that are over 80 years that should be protected for their ecosystem value, as well as their importance for future old growth recruitment.	See Response 4.2
11.2	Great Old Broads for Wilderness	Don't understand where >6" oak might be cut where it would present "an immediate hazard to retention of desirable trees within clumps or groups". In these cases, we would recommend retention of the large diameter trees adjacent to clumps or groups.	Large diameter oak could pose a threat to the retention of desirable trees if the oak occurs underneath those trees and creates ladder fuel which would allow fire to climb into the tree canopy. We agree that large diameter oak should be retained when possible.
11.3	Great Old Broads for Wilderness	No overlay map of roadless areas in the project map, and an insufficient delineation indicate roadless significance has not been fully considered	A map of CRA was added to the final EA. Roadless character impacts have been disclosed in the EA, as summarized, "Under the Proposed Action, the nine roadless characteristics would be better protected in the long-term..."

Comment #	Affiliation	Comment: quote, paraphrase, or topic	Forest Service Response
11.4	Great Old Broads for Wilderness	How trees of cultural value and related culturally significant areas will be protected, and whether culturally-appropriate documentation has taken place.	Consultation with the 25 tribes that are culturally affiliated and traditionally associated with the was initiated in September of 2020 with a follow up field trip (with SUIT and Ute Mtn Ute) to the proposed project area in May of 2021. Consultation will continue throughout stages of implementation. Cultural inventories will take place prior to project implementation. Appendix D of the <i>Programmatic Agreement among the United States Forest Service, Rocky Mountain Regional Office, Pike-San Isabel National Forest and Cimarron and Comanche National Grasslands, Routt National Forest, San Juan National Forest and the Colorado State Historic Preservation Officer Regarding Vegetation Management Undertakings (USDA 2017)</i> : Site Protection Measures identifies a strategy and activity-specific design features intended to mitigate potential adverse impacts of the proposed activities on cultural resources, including culturally modified trees. With adherence to all cultural resource design elements, the proposed action will have no adverse effect on cultural resources. Wording in the EA has been added to clarify.
12.1	individual (Stransky)	Old growth concerns. Show maps of the Old growth GIS data layer over-laid with the different types of proposed treatment areas. OG areas are special ecosystems with many components other than the OG trees. Use the San Juan's old growth database to protect the existing OG polygons/stands within the HD's.	See Response 4.2
12.2	individual	Roadless area map not included. The roadless character of the area must be kept intact.	A map of CRA was added to the final EA. Roadless character impacts have been disclosed in the EA, as summarized, "Under the Proposed Action, the nine roadless characteristics would be better protected in the long-term..."
13.1	Environmental Protection Agency	We recommend as much available site-specific information be included in the Final EA such as maps showing specific treatment areas, and potential treatment methods and mitigation measures for each area based upon site specific resources and conditions. If this is not practical for the Project, we recommend USFS consider public notification and the opportunity to provide input on the site-specific treatment plans. We also recommend outlining how the public notification process will work in the Final EA.	Figure 2 in the EA shows the potential mechanical treatment and prescribed fire areas. Treatment methods are described in the Proposed Action; which particular method will be used in each mechanical unit will not be decided until implementation and will be based on market and industry conditions at the time. Project-specific design elements are included in the Proposed Action, in addition to Appendix A which lists more generic Existing Design Elements and Best Management Practices. Because the mechanical treatment units are so small, and the impacts therefore so minimal, there is no need for further public input at the implementation stage. The public and adjacent landowners are always notified prior to implementation actions through press releases, social media, and direct mailings prior to prescribed burning.

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13.2	Environmental Protection Agency	Recommend the USFS conduct a NEPA sufficiency review every 10 years if the project duration exceeds 10 years. recommend the NEPA sufficiency review involve a public disclosure process	Per FSH 1909.15 (18), new information or changed circumstances relating to impacts of the project would trigger a review of whether the new information or changed circumstances are within the scope and range of effects considered in the EA. The review is often referred to as a Supplemental Information Report (SIR), which could result in internal documentation of sufficiency or minor correction through errata. A SIR could alternatively result in the determination that a supplement or revision to the EA is necessary, in which case, normal public notice and comment processes would be followed.
13.3	Environmental Protection Agency	There are likely wetlands...recommends the USFS either conduct a wetland delineation and correspond with U.S. Army Corps of Engineers to ensure compliance with Section 404 of the Clean Water Act prior to any disturbance or by default, treat mesic meadows as wetlands and apply protections equivalent to other wetlands.	The National Wetland Inventory (NWI) database and an aerial image interpretation do not readily show any wetlands within the analyzed landscape. Project design elements are in place to exclude operations in areas where wetlands, riparian and groundwater resources (e.g. springs/seeps) are identified on the ground, as well as include specific buffer distances to these resources. The implementation of these design criteria and best management practices will ensure compliance with the Clean Water Act through guidance from the Region 2 Watershed Conservation Practices Handbook (FSH 2509.25).
13.4	Environmental Protection Agency	Recommend the Final EA identify actions that could be taken to move riparian areas, wetlands and water quality. If additional analysis is needed to identify actions for some specific streams, we recommend specifying a schedule for that analysis in the Final EA and dedicating the resources necessary to accomplish this expediently.	Wetlands, streams courses and their riparian corridors are not expected to be negatively impacted (long-term) from the proposed actions since these areas will be excluded from treatments and buffer distances will be applied. More specific project design for mechanical treatments will occur prior to implementation and will be outlined in the project contracts. Locations that have been used to look at riparian and stream health (PFC monitoring locations) will continue to be used in the future to determine impacts from the proposed actions identified in this EA as well as trend. Improvements to and the proper closure and rehabilitation of parts of the road and trail network within this landscape should help with the identified impacts to stream health currently occurring and is one distinct way to improve currently limiting watershed conditions. Currently no stream courses in this landscape are on the 303(d) List of Impaired Waters and all state-identified beneficial uses are being met, so further monitoring is not deemed necessary at this point.
13.5	Environmental Protection Agency	Recommend monitoring specific vegetation treatments and prescribed burn area efforts annually for five years.	All prescribed fire units are monitored annually with photo plots and fuel loading measurements. In addition, all proposed mechanized vegetation treatments will continue pre-and post-treatment monitoring including photo points, assessment of post-treatment basal area, and shrub cover.

Comment #	Affiliation	Comment: quote, paraphrase, or topic	Forest Service Response
13.6	Environmental Protection Agency	Recommend that information on air quality be included, characterizing existing conditions and the degree air quality would be affected considering the acreages to be treated annually and in total. Specific recommendations on how to do this are included in the letter.	All prescribed fire is done under permit conditions from the Colorado Department of Public Health & Environment. These conditions are designed to limit smoke impacts to the public and include daily acreage limits as well as only allowing burning when atmospheric conditions limit the impact of smoke on populated areas.
13.7	Environmental Protection Agency	Recommend the USFS consider prescribed fire design criteria and monitoring requirements, including Interagency Prescribed Fire Planning and Implementation Procedures Guide, public notification of pending burns, consult with the CDPHE, monitored PM10 concentrations near the Project Area are not greatly affected, NEPA document clearly explain the planning and procedure that will be followed regarding prescribed burns.	USFS policy requires following the Interagency Prescribed Fire Planning and Implementation Procedures Guide, extensive public notification of pending burns, and only burning under conditions specified under a smoke permit issued by CDPHE. This is not detailed in the NEPA document since it is overarching agency policy.
14.1	Colorado Parks and Wildlife	We recommended not working on the project during the Big Game Winter Closure from December 1- April 30. Since, the EA clearly contemplates working in the Big Game Winter Closure Area in the winter, we recommend that the concentrating work locations in close proximity to each other.	Project activities in the proposed action are required to comply with the San Juan National Forest Land and Resource Management Plan. Accordingly, project implementation should abide by the Forest Plan guideline 2.3.60 to limit or avoid management activities and access in critical winter range, severe winter range, and winter concentration areas for pronghorn, elk, and mule deer from December 1–April 30. However, because this guideline leaves room for some discretion, we have already incorporated additional design elements in case some activities are authorized inside of this winter closure period. At present, the proposed action does not specify the timing of mechanical treatments or prescribed fire, rather, implementation will be based on an analysis of weather and fuel conditions. However, favorable conditions for prescribed fire commonly occur in fall and late spring, often outside of the winter closure period.
14.2	Colorado Parks and Wildlife	CPW recognizes an increasing use in the winter that is not necessarily acknowledged in the EA. p.42	Wording has been edited in the final EA to recognize increasing winter use.

Comment #	Affiliation	Comment: quote, paraphrase, or topic	Forest Service Response
14.3	Colorado Parks and Wildlife	Did not see an evaluation and monitoring program on how forage allocations would occur to ensure that habitat conditions are not degraded with domestic goat and cattle grazing. Goats are also a source of weeds and FS needs to have a weed management program and continue weed spraying and monitoring. Please include more information regarding the process, and monitoring program to ensure that habitat conditions for wildlife are not degraded as a result of the grazing action.	Goat grazing in this scenario would be done under contract. The shepherd will monitor forage conditions in the areas grazed by goats and the herd will be moved when utilization levels are met. Areas grazed by goats will be monitored for noxious weeds and treated as necessary. This type of intensely managed grazing makes it easier to control forage use than under conventional livestock grazing.
14.4	Colorado Parks and Wildlife	CPW recommends resting of the areas after vegetation treatments including burning for a minimum of 3 years to let the grasses and forbs rejuvenate and establish root systems before they are grazed.	Treatment units and prescribed burning would be temporally and geographically separated so that there will be a mosaic of treated and untreated areas in order to provide for livestock forage. Management of livestock grazing at the site-specific level to avoid particular treated areas can be accomplished through herders, if necessary.
15.1	individual (Thomsen)	There doesn't appear to be enough attention paid to traditional Native American uses of these lands and all of its resources.	Consultation with the 25 tribes that are culturally affiliated and traditionally associated with SJNF was initiated in September of 2020 with a follow up field trip (with SUIT and Ute Mtn Ute) to the proposed project area in May of 2021. Consultation will continue throughout stages of implementation.
15.2	individual	Treatment protocols listed with this project are not in alignment with roadless areas	The project has undergone Regional Forester review and it was determined that all proposed activities are allowed under the Colorado Roadless Rule. Tree cutting is allowed under exceptions to prohibited actions, as described in the EA Roadless section. The EA states that, "The proposed mechanical treatment units are not in the roadless area and no temporary roads are proposed within the CRA." Activities proposed for roadless are limited to prescribed burning and support activities for burning such as hand line construction and incidental tree cutting. Impacts to Roadless area characteristics are disclosed in the EA.
15.3	individual	Look more carefully at the old growth ecosystems	See Response 4.2
16.1	La Plata Electric Assoc.	Request that the notification be at least a week in advance of work beginning	30-day advance notification of affected individuals, entities, and the public is included in existing design element #36, which has been slightly re-worded to more inclusive to specifically include utility companies.
17.1	Four Corners Backcountry Horsemen	We believe that the firebreak from Saul's Creek should be restored, but also that it should not be considered for motorized trail in the future.	The motorized trail is no longer part of the proposed action. A design element was moved into Project-Specific Design Elements (new #7), and language was added regarding installation of erosion control measures on steep erosive soils. Language will also be included in prescribed fire burn plans requiring rehabilitation in areas that are highly prone to erosion.

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17.2	Four Corners Backcountry Horsemen	Lack of a map of the Roadless Area boundaries and the failure to include a map of showing the location of the Area and of the Chimney Rock National Monument to be a substantial omission.	A map of roadless areas has been added to the final EA. CRNM boundary has also been included in this map.
17.3	Four Corners Backcountry Horsemen	Lack of mapping for old growth ponderosa stands. Preserve as much of the remainder as is possible.	See Response 4.2
18.1	Hopi Tribe	Supports the identification and avoidance of our ancestral sites, and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties.	FS responded directly to commenter.
18.2	Hopi Tribe	Interested in consulting on any proposal that has the potential to adversely affect prehistoric sites. We appreciate that if any Native American human remains or funerary objects are discovered during implementation they will be reported as required by law.	FS responded directly to commenter.
19.1	San Felipe Pueblo	requesting additional information about how cultural sites, archaeological sites and resources will be managed and protected in the course of this undertaking.	FS responded directly to commenter. Also see Response 2.1